

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

CHRISTOPHER CHASE,

Defendant.

17-CR-101-RJA-JJM

NOTICE OF MOTION

MOTION BY:

Frank R. Passafiume, Assistant Federal
Public Defender, Attorney for Christopher
Chase.

DATE, TIME & PLACE:

Before the Honorable Jeremiah J. McCarthy
United States Magistrate Judge, Robert H.
Jackson United States Courthouse, 2
Niagara Square, Buffalo, New York 14202,
on the papers.

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public
Defender Frank R. Passafiume, dated
July 27, 2017.

RELIEF REQUESTED:

Forty-five (45) day adjournment of pretrial
motion deadline.

DATED:

July 27, 2017, Buffalo, New York.

Respectfully submitted,

/s/Frank R. Passafiume

Frank R. Passafiume
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Federal Public Defender's Office
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(716) 551-3341; 551-3346 (fax)
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Attorney for Christopher Chase

TO: Jonathan Cantil
Assistant United States Attorney

UNITED STATES DISTRICT COURT
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v.

CHRISTOPHER CHASE,

Defendant.

17-CR-101-RJA-JJM

**AFFIRMATION IN SUPPORT
OF MOTION**

FRANK R. PASSAFIUME, ESQ., affirms under penalty of perjury that:

1. I am an attorney with the Federal Public Defender's Office located at 300 Pearl Street, Suite 200, Buffalo, New York 14202, and I represent the defendant, Christopher Chase, in the instant matter.

2. The defendant's pretrial motions are currently due by August 4, 2017.

3. The instant motion respectfully requests a forty-five (45) day extension for the defendant to file pretrial motions.

4. The government has provided significant voluntary discovery. The discovery is currently being reviewed by the defendant's computer forensic expert.

5. Defense counsel and the government continue to be engaged in plea negotiations.

6. Lastly, defense counsel will be on personal medical leave for several weeks during the month of August.

7. An adjournment will allow time for defense counsel to continue to review discovery, and to continue plea negotiations, before and after the personal medical leave.

8. I have discussed this request with Assistant United States Attorney Jonathan Cantil, and Mr. Cantil has no objection to an adjournment.

6. Should the Court grant an adjournment, the parties further agree that the time between the filing of this motion and the new pretrial motion deadline is excluded from the Speedy Trial calendar.

DATED: July 27, 2017
Buffalo, New York.

Respectfully submitted,

/s/Frank R. Passafiume

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